

# EXHIBIT D

**S H O O K**  
HARDY & BACON

**Shook, Hardy & Bacon L.L.P.**

2555 Grand Boulevard  
Kansas City, MO 64108-2613  
(816) 474-6550

- 33206.393697 -

**JOHN LEWIS JR.**  
RECEIVER  
600 TRAVIS ST., SUITE 3400  
HOUSTON TX 77002-2926

**Invoice No:** 2275937  
**Invoice Date:** 1/24/2023  
**Matter Number:** 33206.393697  
**Billing Attorney:** John Lewis Jr.

**Summary of Invoice**

For professional services and disbursements thru December 31, 2022

SEC vs. Mauricio Chaves, et al. - John Lewis, Jr. Receiver  
Receivers Invoice

Current Fees	\$ 84,315.00
Current Disbursements	0.00
<b>Total Current Fees and Disbursements</b>	<b>\$ 84,315.00</b>

**REMITTANCE INFORMATION**

*Please verify your records reflect our new Wiring Instructions and Remit Address.*

**Wiring Instructions**

Commerce Bank  
1000 Walnut  
Kansas City, MO 64106  
ABA Number: 101000019  
SWIFT: CBKCUS44  
Account Number: 43056

**Remit Address**

Shook, Hardy & Bacon L.L.P.  
PO Box 843718  
Kansas City, MO 64184-3718

**Federal Tax ID:**

44-0585497

Payments received after 1/17/2023 may not be reflected herein.



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## Summary of Invoice

For professional services and disbursements thru December 31, 2022

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Receivers Invoice

### Professional Services

Date	Attorney	Description	Hours	Amount
<b>SEC01</b>	<b>Asset Analysis</b>			
09/26/22	JLJ	Review incoming information from SEC and Hays regarding public records search, preparation for appointment hearing.	3.50	\$ 1,837.50
09/30/22	JLJ	Continued inventorying of receivership assets at Blalock. Strategy and role sorting exercise meeting with receivership team.	2.70	1,417.50
10/02/22	JLJ	Review materials provided by SEC. Create work plan for team meeting tomorrow.	2.50	1,312.50
10/04/22	JLJ	Skim Bittrex (crypto) production. Review and revisions to Retained Professionals employment applications. Correspondence with Coinbase regarding frozen accounts (900k USD), Attention to banking and establishment of fiduciary accounts.	4.00	2,100.00
10/05/22	JLJ	Visit to Bank to convert recovered currency to cashiers check for deposit. Confer with branch manager at JMP Chase branch in downtown houston. Participate in Bank's AML protocols.	1.00	525.00
10/05/22	JLJ	Work on Hays employment application. Turns of same.	1.00	525.00
10/06/22	JLJ	Review and responses to 20+ emails from team regarding document requests, dedicated email and hotline verbiage. Review and approve employment applications for SHB and HFC	1.50	787.50
10/11/22	JLJ	Prepare for and lead call with D. Gerber regarding retainer held and involvement in SEC proceeding prior to receiver appointment.	0.80	420.00
10/14/22	JLJ	Exchanges and guidance to team regarding Waller and Fort Bend county real estate and review of newly discovered affiliated corporate entities.	0.70	367.50
10/14/22	JLJ	Exchanges regarding follow up with Chavez counsel (Gerber) regarding recovery of nine boxes at his office.	0.50	262.50

Date	Attorney	Description	Hours	Amount
10/14/22	JLJ	Give direction to team as to outreach with counsel for Benvenuto (Cogdell) on outstanding document requests and carveout request.	0.50	262.50
10/14/22	JLJ	Approve correspondence for supplemental requests of Chavez and Benvenuto lawyers (Burford).	0.40	210.00
10/19/22	JLJ	Call with M. Gulde (SEC) and S. Themeli regarding newly discovered facts in violation of asset freeze.	0.90	472.50
10/21/22	JLJ	Calls and emails with Scott A. regarding liquidation protocol for Blockchain holdings.	1.20	630.00
10/24/22	JLJ	Attention to Salesforce access and approve correspondence regarding document retention.	0.70	367.50
10/25/22	JLJ	Revisions to status update to M. Gulde.	1.20	630.00
10/26/22	JLJ	Prepare for Burford interview call. Respond to 20+ emails.	1.60	840.00
10/26/22	JLJ	Refinements to summary requested by M. Gulde.	0.80	420.00
10/27/22	JLJ	Interview with Sklar and ST. Debrief after call.	1.00	525.00
10/31/22	JLJ	Review status of Chavez and Benvenuto's compliance with Order and follow up letters in determination of timing and extent of claw back of unearned retainers by Gerber, Cogdell and Burford.	0.80	420.00
11/02/22	JLJ	Consideration of whether to oppose Sklar withdrawal motion and briefly confer with team regarding retainers, scope of Sklar's representation of Chavez and other factors.	0.50	262.50
11/03/22	JLJ	Confer regarding options for document review mechanics and related cost considerations.	0.80	420.00
11/04/22	JLJ	Attention to banking matters.	0.80	420.00
11/04/22	JLJ	Review intel on Chicago office location.	0.80	420.00
11/14/22	JLJ	Vetting of investigators for LA, IL and other rumored business locations.	1.20	630.00
11/14/22	JLJ	Attention to communications regarding incoming checks from bank account sweep.	0.50	262.50
11/14/22	JLJ	Attention to exchanges regarding Gerber retainer and trailing document production issues.	0.40	210.00
11/14/22	JLJ	Skim Burford production and direct demand for remaining retainer.	0.30	157.50
11/14/22	JLJ	Review and offer edits to Vargas letter in lieu of interview.	0.20	105.00
11/17/22	JLJ	Review investigative material on Ebenezer Construction and relationship to CBT and Torres.	0.80	420.00
11/17/22	JLJ	Attention to banking following Regions sweeps.	0.50	262.50

Date	Attorney	Description	Hours	Amount
11/21/22	JLJ	Take cash recovered from CFX premises safes and convert to cash at Chase Bank. Confer with branch manager regarding AML and related issues.	1.20	630.00
12/01/22	JLJ	Review Hays writeup on ongoing fraud investigation and Zavalo/Chicago real estate transactions.	1.20	630.00
12/01/22	JLJ	Skim produced documents relating to Tomball Parkway real estate transaction.	0.80	420.00
12/01/22	JLJ	Review documentation regarding sale of computer equipment, televisions and other office equipment from Blalock.	0.60	315.00
12/01/22	JLJ	Review and decide on Flack retainer issue.	0.40	210.00
<b>Subtotal for SEC01 Asset Analysis</b>			<b>38.30</b>	<b>\$ 20,107.50</b>
<b>SEC02 Asset Disposition</b>				
10/05/22	JLJ	Call with Coinbase inhouse counsel M. Cianfani regarding transactions and liquidation process.	1.00	\$ 525.00
10/05/22	JLJ	Update from ST on appraisal and recovery of vehicles noted in the SEC complaint. Conf with ST regarding discovered closing of real property and stopping same (property listed day before receivership ordered entered).	1.00	525.00
10/10/22	JLJ	Lengthy team call review action items related to liquidated of crypto currency accounts, negotiations with land lord, strategize regarding dealings with parties' counsel, banking matters, disposition of real estate, set up of website, receiver hotline, role sort on other tasks.	2.50	1,312.50
10/25/22	JLJ	Review proposals from real estate agents. Attention to lease termination negotiations.	0.80	420.00
10/31/22	JLJ	Attention to ongoing liquidation of Blockchain and Coinbase holdings.	0.40	210.00
11/02/22	JLJ	Review and comment upon real estate listing and engagement agreement templates.	0.80	420.00
11/02/22	JLJ	Review of exchanges regarding ongoing efforts to liquidate Coinbase holdings.	0.70	367.50
11/02/22	JLJ	Review and verification of Blockchain liquidation amount and wiring details.	0.50	262.50
11/14/22	JLJ	Review and execution of real estate listing agreements for sale of Ft. Bend and Waller County properties.	0.60	315.00
11/14/22	JLJ	Update on situation with Blalock safe and options with vendor.	0.40	210.00

Date	Attorney	Description	Hours	Amount
12/01/22	JLJ	Attention to appraisal requirements in receivership order and retention of appraisers for Fort Bend property.	0.40	210.00
12/05/22	JLJ	Update on turnover of Chavez vehicles and related documentation.	0.30	157.50
<b>Subtotal for SEC02 Asset Disposition</b>			<b>9.40</b>	<b>\$ 4,935.00</b>
<b>SEC03 Business Operations</b>				
10/12/22	JLJ	Attention to 20+ emails on topics including directing negotiations with Landlord, skim Cogdell responses to court ordered documents from Benvenuto, collection of records from Gerber on behalf of Chavez. Approval of bids for ordinary expenses related to opening office safe, forensic search of premises security system.	3.20	\$ 1,680.00
10/14/22	JLJ	Briefings on status of negotiations with Blalock landlord and his counsel regarding claim of outstanding rent, access to property and termination of lease to abate continuing estate obligation.	0.70	367.50
11/14/22	JLJ	Review and edit landlord release draft.	0.40	210.00
11/17/22	JLJ	Authorize locksmith to forcibly enter remaining safes at Blalock.	0.30	157.50
11/18/22	JLJ	Detail walk through of Blalock premises considering landlord's offer to purchase certain remaining FFE, custody of cash and contents of safes after forced opening by locksmith.	3.50	1,837.50
12/05/22	JLJ	Review and approve documents memorializing settlement with Blalock landlord.	0.60	315.00
<b>Subtotal for SEC03 Business Operations</b>			<b>8.70</b>	<b>\$ 4,567.50</b>
<b>SEC04 Case Admin</b>				
09/01/22	JLJ	Meetings and review research regarding SEC receivership opportunity.	3.00	\$ 1,575.00
09/08/22	JLJ	Work on SEC Receiver proposed work plan.	3.50	1,837.50
09/12/22	JLJ	Review intelligence on parties in prep for call with SEC.	2.50	1,312.50
09/13/22	JLJ	CryptoFX SEC receivership proposed work plan to SEC	4.00	2,100.00
09/19/22	JLJ	Prepare for meeting with Court and SEC. Discussion with team about next steps.	3.20	1,680.00
09/20/22	JLJ	Conversations with SEC regarding hearing on appointment. Meetings with team.	2.50	1,312.50
09/23/22	JLJ	Continued work on SEC receivership proposal.	4.00	2,100.00

Date	Attorney	Description	Hours	Amount
09/29/22	JLJ	Numerous calls and email with Receivership team as they inventory Blalock documents and computers.	2.80	1,470.00
10/03/22	JLJ	Team huddle to strategic regarding computer forensics, motions, document requests, demand for books and fiduciary banking matters. Call with M. Gulde and J. Harris.	2.50	1,312.50
10/05/22	JLJ	Attention to website development, approval of commercial cleaners.	1.00	525.00
10/05/22	JLJ	Draft and revisions to credentialing letter for use by receivership team.	1.00	525.00
10/11/22	JLJ	Attention to billing set up, administrative matters pertaining to receivership. Calls with firm billing, file management and related matters.	1.60	840.00
10/14/22	JLJ	Call with KCC vendor regarding elements of website and referral of crypto experts if needed.	0.70	367.50
10/16/22	JLJ	Review of task lists regarding Coinbase, Document scanning, real property issues, approval of administrative expenses, exchanges with Blockchain, status of website, hotline and USPS mail redirection and review, review of shared SEC files, demand for personal property in preparation for weekly team call.	2.20	1,155.00
10/17/22	JLJ	Weekly activity and update call with team. Call with L. Ferm (KCC) regarding case management administrative issues.	1.50	787.50
10/19/22	JLJ	Strategize next steps with S. Themeli on various issues.	0.90	472.50
10/20/22	JLJ	Call with team regarding action items following new information from cooperating witness.	1.50	787.50
10/21/22	JLJ	Skim and respond to 30+ emails from victims, correspondence with receivership defendants counsel, give guidance to team members. Review and approve final iteration of website.	1.50	787.50
10/24/22	JLJ	Analysis and decision making about ongoing work streams during weekly call regarding liquidation of crypto accounts, final approval of website, hotline and emails, discuss coverage of case on Univision and other spanish speaking media outlets, interviews of potential cooperating witnesses.	1.50	787.50
10/31/22	JLJ	Review and approve FAQs for website.	0.50	262.50
11/02/22	JLJ	Discussion with CMG and approve document management processes and protocols of review.	0.70	367.50
11/02/22	JLJ	Review and approve website FAQs.	0.30	157.50



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Date	Attorney	Description	Hours	Amount
11/04/22	JLJ	Review and approve document review protocols and cost.	0.60	315.00
11/07/22	JLJ	Weekly team strategy call regarding next steps re Coinbase, update on status of OCR and document scanning., debrief of Benvenuto interview, discussion of motion to show cause directed at Chavez. Ongoing updates on issues related to landlord, third party subpoenas and inquiries regarding additional operating locations.	1.30	682.50
11/14/22	JLJ	Exchanges with team over Benvenuto laptop and Cogdell retainer.	0.30	157.50
11/17/22	JLJ	Review recently discovered "shadow" website and consider next steps.	0.40	210.00
11/21/22	JLJ	Team call reviewing status of ongoing work structure and content of report, status of ongoing negotiations with landlord, status of marketing of Waller County properties, document management strategy, staffing upcoming SEC noticed depositions and considerations around document sharing with SEC.	1.20	630.00
11/28/22	JLJ	Skim hot documents from Relativity scan.	1.80	945.00
12/01/22	JLJ	Attention to email exchanges regarding Microsoft 365 information request and internal discussions with Microsoft relationship partner regarding same.	1.30	682.50
12/02/22	JLJ	Reviewing cost considerations of UCC-1 and other business databases and options related.	0.80	420.00
12/05/22	JLJ	Team huddle to analyze evidence establishing ongoing fraud scheme.	1.20	630.00
12/06/22	JLJ	Review and approval of sponsor demands and delegation of authority for Relativity/document management platform.	1.70	892.50
12/12/22	JLJ	Team call to review and strategize regarding recap of SEC depositions, local Louisiana counsel coordination, Chavez contempt motion, consideration of additional parties to expand the receivership, closeout of landlord issues, third party subpoenas, brainstorm approach for interviewing employees.	1.60	840.00
12/13/22	JLJ	Outline ongoing necessary work during holiday break and 1:1 discussions with team.	0.70	367.50
<b>Subtotal for SEC04 Case Admin</b>			<b>55.80</b>	<b>\$ 29,295.00</b>
<b>SEC11</b>	<b>Status Reports</b>			
11/17/22	JLJ	Skim and annotate rough draft of First Interim Report.	1.10	\$ 577.50
11/20/22	JLJ	Edits to draft receiver report.	3.50	1,837.50



Date	Attorney	Description	Hours	Amount
11/21/22	JLJ	Work on Court ordered interim report.	3.60	1,890.00
11/22/22	JLJ	Turns of First Interim Report including review of status of ongoing doc and forensic review, time line development and Ponzi elements.	3.50	1,837.50
11/27/22	JLJ	Turns of First Interim Report.	1.50	787.50
11/28/22	JLJ	Strategy call with team to review and refine First Interim Report.	1.40	735.00
<b>Subtotal for SEC11 Status Reports</b>			<b>14.60</b>	<b>\$ 7,665.00</b>
<b>SEC13 Litigation</b>				
09/29/22	JLJ	Appear at Receivership appointment hearing. Confer with Defendants and Counsel. Travel to Blalock office and search. Conferral with SEC, Defendants. Secure premises. Engage locksmith.	9.50	\$ 4,987.50
11/02/22	JLJ	Weigh in on preparation for Benvenuto interview and strategize regarding areas of focus.	0.60	315.00
11/08/22	JLJ	Review of exhibits to SEC lawsuit and skim initial production.	3.30	1,732.50
11/09/22	JLJ	Review Chavez Answer, consideration of Sklar's role in filing answer in light of pending show cause draft directed to Chavez; review and edit show cause motion.	1.10	577.50
11/09/22	JLJ	Attention to ongoing discussions regarding Benvenuto voluntary interview.	0.40	210.00
11/09/22	JLJ	Consideration of receiver team involvement in SEC depositions.	0.30	157.50
11/10/22	JLJ	Revisions and followup question regarding motion for show cause.	1.30	682.50
11/14/22	JLJ	Edits to motion to show cause.	0.50	262.50
11/14/22	JLJ	Update on developments in retention of Orleans Parish ancillary litigation.	0.40	210.00
11/17/22	JLJ	Consideration of Gerber Chavez representation and proposed carve out request by Gerber balanced by Chavez cooperation.	0.50	262.50
11/17/22	JLJ	Consider and authorize subpoena for self storage, WhatsApp, PayPal.	0.40	210.00
11/17/22	JLJ	Briefing on NJ operations Strategic considerations of Vargas deposition involvement.	0.30	157.50
11/17/22	JLJ	Exchanges regarding Coinbase subpoena.	0.30	157.50
11/29/22	JLJ	Call with ST regarding Vargas deposition and outreach from Chavez for attorney carveout and recovery of vehicles.	0.50	262.50



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Date	Attorney	Description	Hours	Amount
12/01/22	JLJ	Review rationale and approve the issuance of 20+ third party subpoenas.	2.50	1,312.50
12/01/22	JLJ	Consideration and approval of document repository motion.	0.50	262.50
12/02/22	JLJ	Review and analysis of company documents.	0.80	420.00
12/05/22	JLJ	Detailed review of Hay's analysis and quantification of ongoing fraud investigation into potentially related entities including JJ Trust, Aspire Living, JCA Trust and several other entities.	1.50	787.50
12/05/22	JLJ	Consideration of legal authorities relating to producing documents collected from various sources related to receivership defendant.	1.50	787.50
12/05/22	JLJ	Attention to Salesforce subpoena and notes from statements, documents and pictures provided by cooperating investor.	1.30	682.50
12/06/22	JLJ	Work through potential conflict issues related to issuance of third party subpoenas to large tech companies. Internal emails and calls regarding same.	0.80	420.00
12/07/22	JLJ	Conduct analysis of company documents in order assess ongoing fraud.	2.50	1,312.50
12/12/22	JLJ	Skim business records reflecting extent of Chavez personal enrichment during SEC investigation.	1.20	630.00
12/13/22	JLJ	Detailed review of Fifth Amendment research and comments to same.	1.80	945.00
<b>Subtotal for SEC13 Litigation</b>			<b>33.80</b>	<b>\$ 17,745.00</b>
<b>Total Fees</b>			<b>160.60</b>	<b>\$ 84,315.00</b>

**Timekeeper Summary**

Initials	Name	Hours	Rate	Amount
JLJ	Mr. Lewis	160.60	\$ 525.00	\$ 84,315.00
<b>Total Fees</b>				<b>\$ 84,315.00</b>

**Invoice Summary**

Current Fees	\$ 84,315.00
Current Disbursements	<u>0.00</u>
<b>Total Current Fees and Disbursements</b>	<b><u>\$ 84,315.00</u></b>